



October 21, 1997

Mr. K. David Waddell Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37238

Re:

Universal Service Generic Contested Case

Docket No. 97-00888

Dear Mr. Waddell:

Enclosed are the original and thirteen (13) copies of NEXTLINK Tennessee, L.L.C.'s responses to the staff's October 14, 1997, request for comments.

Copies are being served on counsel of record.

Sincerely,

Dana Shaffer

Enclosures

cc: Counsel on Service List

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BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:

UNIVERSAL SERVICE, GENERIC CONTESTED CASE DOCKET NO. 97-00888

RESPONSE OF NEXTLINK TENNESSEE, L.L.C. TO TENNESSEE REGULATORY AUTHORITY STAFF'S REQUEST FOR COMMENTS

On October 14, 1997, the TRA Staff asked the parties to the above referenced proceeding to provide inputs on the following items by October 21, 1997:

- Comments on whether the new issues identified by the Staff for Phase 1 are appropriate. Those issues are 8d and e, 9a and f through k, and 15.
- A statement on each of the issues as to whether a settlement is possible or whether the issues can be handled by briefs alone (i.e. testimony at a hearing will not be necessary.)
- Identification of issues of law and comments on the proposed briefing schedule.
- Comment on the issues identified for Phase 2.
- Comments on the schedule for completion of Phase 1 and Phase 2.
- Whether a response to Issue 16 could be delivered by November 14.
- Whether a list of Access Charge Reform Issues to be worked jointly with the Phase 2 issues could be delivered by November 14.

NEXTLINK Tennessee, L.L.C. ("NEXTLINK") hereby submits the following responses to the Staff's request for comments:

NEXTLINK believes the inclusion of issues 8d and e, 9a and f through k, and 15 in the Phase 1 proceeding is appropriate. Because the issues in the Phase 1 proceeding are primarily policy issues, NEXTLINK does not plan to present direct testimony or to request discovery. NEXTLINK intends to brief its position on Phase 1 issues.

The proposed schedule for completion of Phase 1 and Phase 2, although aggressive, is workable, and the Staff's request that responses to issue 16 and a list of Access Charge Reform issues be filed by November 14 is reasonable. NEXTLINK would request, however, that an additional week be allowed for the filing of reply briefs in the Phase 1 docket. Additionally, a tentative date should be set for the filing of post-hearing briefs.

Respectfully submitted,

Dana Shaffer, #16607

Attorney for NEXTLINK Tennessee, L.L.C.

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CERTIFICATE OF SERVICE

I hereby certify that on October 21, 1997, a copy of the foregoing document was served on the parties of record, via U. S. Mail, postage pre-paid, addressed as follows:

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